



Ace Computers Responsible Minerals Sourcing Policy (Conflict Minerals Policy)

Company Statement:

3TG Minerals (Tin, Tungsten, Tantalum, and Gold, aka “3TG minerals”) are commonly found in electronic products and have been determined to be necessary for product functionality and production. Unfortunately, the mining, trade, and sale of 3TG minerals have been used directly and indirectly to finance armed conflict and violence in the Democratic Republic of Congo and several adjoining countries (the “DRC Region”). While Ace Computers does not purchase 3TG minerals directly from mines, smelters, or refiners, 3TG minerals can be found and are used in components that Ace Computers purchases for utilization in critical technology solutions. Therefore, Ace Computers is committed to ensuring that 3TG minerals contained in our products are sourced with due respect for Human Rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices. At the same time, Ace Computers does not ban the use of 3TG Minerals that originate in conflict- affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all 3TG minerals from these areas would cause a de facto embargo with serious adverse impact on the living conditions of local populations. In order to meet our program goals, Ace Computers collaborates with suppliers, industry peers, and stakeholders. Ace Computes has implemented processes to perform our own RCOI (Reasonable Country of Origin) search and due diligence practices to evaluate smelters/refiners used within our supply chain.

Conflict Minerals Review Procedures:

Annually, Ace Computers will work with suppliers and stakeholders to obtain an exhaustive list of all smelters/refiners that are used in our supply chain. The list of smelters/refiners is compared against the list of independently verified smelters/refiners found to be responsibly sourcing 3TG minerals (i.e., Conflict Free Smelter Program). As necessary, Ace Computers will follow up with our suppliers in the event it has become apparent the use of a nonconformant smelter/refiner is being utilized.

The following procedure outlines the steps that will be taken by Ace Computers to evaluate our suppliers and the use of 3TG minerals within Ace Computers’ Supply Chain;

1. Prepare list of applicable suppliers utilized for previous calendar year. This is done through the utilization of Ace Computers’ ERP system.
2. Perform online searches of the United States Security and Exchange Commission (SEC) Form SD system for submittal of the Annual Form SD reporting.
 - a. *Note: Publicly traded companies are required to report to the SEC by the end of May of each calendar year.*
3. If a company is not required to report to the SEC or they have not yet done so, an online search of the supplier’s public website for information as it relates to Conflict Minerals, for the most recent calendar year will be conducted.
4. If the company does not have any publicly available information Ace Computers’ will send out ACE080 3TG Supplier Request Letter, requesting the information be shared.



5. The goal of search/inquiries as noted in # 2, 3, and 4 is to compile an exhaustive list of all smelters/refiners utilized by Ace Computers suppliers.
6. Ace Computers has chosen to use the most recent version of the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template to document and review our smelters/refiners.
7. Once the most exhaustive list possible has been compiled, Ace Computers will then review the list of smelters/refiners against the RMI RMAP conformant smelters and refiners list.
8. If a smelter/refiner on the list is found to be nonconformant or does not currently participate in any third-party verification program, and they are located in a covered conflict region, Ace Computers will take action, working with the supplier to determine an appropriate corrective action.
 - a. *Note: All companies have their own unique set of process and challenges and as such the type of corrective actions may vary on a case-by-case basis, the details of the inquiries and proposed corrective actions will be noted in ACE081 Ace Computers Annual Responsible Sourcing Report.*
9. The results of Ace Computers RCOI and due diligence process will be summarized in ACE081 Ace Computers Annual Responsible Sourcing Report and will be publicly available via Ace Computers website.

Continual Improvement:

As part of our Conflict Minerals Policy, Ace Computers is looking to monitor multi-stakeholder initiatives working to address issues in responsible mineral sourcing, including the Public/Private Alliance for Responsible Minerals Trade and the Responsible Cobalt Initiative. Ace is continuing to develop our due diligence program for the responsible sourcing of cobalt. Ace Computers has verified that the following suppliers currently participate in their own voluntary due diligence programs for cobalt:

ASUSTek Computer (also known as ASUS)	Gigabyte Technology
Seagate Technology	Western Digital- Committed to implementing a program

Annual Review:

Ace Computers will review the Ace Computers Conflict Minerals Policy at least once annually and update accordingly. All revisions/updates will be documented in the Revision History Table below and will be reposted on Ace Computers public website at least once annually.

Revision History Table		
Date	Description of Change	Approver
2019	Initial Release	J. Samborski
July 2020	Minor edits to Conflict Minerals Policy	J. Samborski
7/16/2021	Added Revision History Table, Clarification on Annual Review Criteria, and Conflict Minerals Review Procedures. Restructured the Policy into Sections	L. Hartranft & A. Robert

This document is online at: <https://acecomputers.com/company/sustainability/>